

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

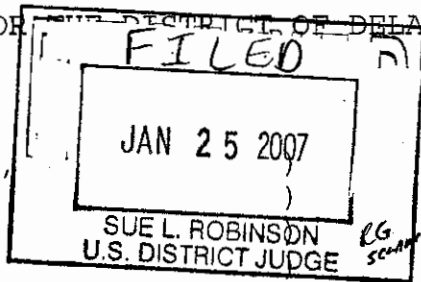
JEFFERY ALONZO SIMMS,

Plaintiff,

v.

HARRY M. FREEMAN, M.D.,
ROBERTA F. BURNS, M.D., AND
MAJOR R.L. HUGHES,

Defendants.



January 16 2007

Civ. No. 04-1205-SLR; 12 exhibit F2-

PETITION FOR ATTORNEY
AND HEARING
KNEE AND HAND INJURED
OVER TURN SUMMARY JUDGMENT

Jeffrey Alonzo Simms, Smyrna, Delaware. Pro se. (OVER TURN SUMMARY JUDGMENT)

Jeffrey M. Austin, Esquire of Elzufon, Austin, Reardon, Tarlov & Mondell, Wilmington, Delaware. Attorney for Defendant Harry M. Freeman, M.D.

Daniel L. McKenty, Esquire of McCullough & McKenty, Wilmington, Delaware. Attorney for Defendant Roberta F. Burns, M.D.

Ralph K. Durstein, III, Esquire of Delaware Department of Justice, Wilmington, Delaware. Attorney for Defendant Major R.L. Hughes

Jeffrey A. Simms, Smyrna Del,
Delaware Correctional Center 1181 Reddick Road 19977

②

In the United States District Court for the
District of Delaware

CIV. NO. 04-1205-SLR

MR. JEFFREY ALONZO SIMMS
PLAINTIFF

V.

PETITION-FOR-ATTORNEY

HARRY M. FREEMAN, M.D. AND OVERTURN SUMMARY JUDGMENT
ROBERTA F. BURNSS, M.D., AND Attorney General
MAJOR R.L. HUGHES MR. Brea Biden
DEFENDANTS, 820. N FRENCH STREET

MR. JEFFREY ALONZO SIMMS, SMYRNA, DELAWARE
PRO SE, COMES TO COURT BEFORE, TO

THE HONORABLE JUDGE SUE L. ROBINSON
TO, PETITION THE COURT TO INVESTIGATE
THE RECORDS AND THE ADVERS
SUBSTANTIVE CONSEQUENCE THE
DELAWARE DEPARTMENT OF CORRECTION
HAVE PLACE THE PRO SE, PLAINTIFF
AND THE PETITION FOR A, ATTORNEY
REQUESTED BECAUSE OF HAND AND
BOTH KNEE INJURY,

January 16, 2007

Jeffrey Alonzo Simms

MR. JEFFREY ALONZO SIMMS 198625

Delaware Correctional Center

1181 Paddock Road

Smyrna, Del 19977

January 16-2007

COPIES SENT TO:

attorney General for State of Delaware
MR. Brea Bidden Biden
820. N. FRENCH Street Wilmington
Delaware 19901

Carl Dan Bunge

Warden Mr. Carroll Thomas
Delaware Correctional Center
Commissioner of Correction
MR. Stars Taylor

FIRST Medical

Gov. Ruth Ann Minner
at State of Delaware

Court papers U.S.A. Wilmington Delaware

③

**DELAWARE DEPARTMENT OF CORRECTIONS
REQUEST FOR MEDICAL/DENTAL SICK CALL SERVICES
FACILITY: DELAWARE CORRECTIONAL CENTER**

This request is for (circle one): MEDICAL DENTAL MENTAL HEALTH

JEFFREY SIMMS

Name (Print)

5-H-U-D-LOWER-10

Housing Location

6-28-64

Date of Birth

198625

SBI Number

1-16-2007

Date Submitted

Complaint (What type of problem are you having)?

FRACTURE Right

hand difficult to use and Badley injured
left and right Knees waiting for
Specialist for illness

Jeffrey Simms

Inmate Signature

1-16-2007

Date

The below area is for medical use only. Please do not write any further.

S:

O:

Temp: _____

Pulse: _____

Resp: _____

B/P: _____

WT: _____

A:

P:

E:

Provider Signature & Title

Date & Time

3/1/99 DE01

FORM#:

MED

263

petition to: Honorable Judge Sueh. Robinson

Respectfully me peter T. Nalleo DKS 1/15/07

Smyrna Landing Road
SMYRNA DE, 19977
Phone No. 302-653-9261

exhibit D

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : SIMMS, JEFFREY A	SBI# : 00198625	Institution : DCC
Grievance # : 84524	Grievance Date : 11/14/2006	Category : Individual
Status : Unresolved	Resolution Status :	Resol. Date :
Grievance Type: Health Issue (Medical)	Incident Date : 11/09/2006	Incident Time :
IGC : Merson, Lise M	Housing Location : Bldg 17, Lower, Tier D, Cell 10, Single	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: Inmate claims: Pain with left and right knee and right hand need Motrin 800 mg. per Dr. Burns examining doctor. No response from medical using sick call slip as of 11/9/06.

Remedy Requested : Need Motrin 800 mg.

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : YES	Date Received by Medical Unit : 12/01/2006
Investigation Sent : 12/01/2006	Investigation Sent To : Rodweller, Deborah
Grievance Amount :	

Smyrna Landing Road
SMYRNA DE, 19977
Phone No. 302-653-9261

Exhibit ①

INFORMAL RESOLUTION

OFFENDER GRIEVANCE INFORMATION

Offender Name : SIMMS, JEFFREY A	SBI# : 00198625	Institution : DCC
Grievance # : 84524	Grievance Date : 11/14/2006	Category : Individual
Status : Unresolved	Resolution Status:	Inmate Status :
Grievance Type: Health Issue (Medical)	Incident Date : 11/09/2006	Incident Time :
IGC : Merson, Lise M	Housing Location :Bldg 17, Lower, Tier D, Cell 10, Single	

INFORMAL RESOLUTION

Investigator Name : Rodweller, Deborah Date of Report 12/01/2006
Investigation Report :
Reason for Referring:

Offender's Signature: _____

Date : _____

Witness (Officer) : _____

IM JEFFREY ALVARO SIMMS
SBI# 198625 UNIT Building 17
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Honorable Chief Judge Sue L. Robinson, U.S.D.C.
United States District Court of Wilmington
Post Box 18
844 King Street
Wilmington Delaware
19801-3570

